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*Proposed Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**CENTURY 21 DEPARTMENT STORES LLC,
et al.,**

Debtors.¹

Chapter 11

Case No. 20-12097 (SCC)

(Joint Administration Requested)

**NOTICE OF COMMENCEMENT OF
CHAPTER 11 CASES AND AGENDA FOR FIRST DAY HEARING**

PLEASE TAKE NOTICE that on September 10, 2020 (the “**Commencement Date**”), Century 21 Department Stores LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the Southern District of New York (Manhattan Division) (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that a hearing (the “**First Day Hearing**”) has been scheduled for **September 10, 2020 at 5:30 P.M. (Eastern Time)** before the Honorable

¹ The Debtors in these chapter 11 cases (the “**Chapter 11 Cases**”), along with the last four digits of each Debtor’s federal tax identification number, as applicable, are Century 21 Department Stores LLC (4073), L.I. 2000, Inc. (9619), C21 Department Stores Holdings LLC (8952), Giftco 21 LLC (0347), Century 21 Fulton LLC (4536), C21 Philadelphia LLC (2106), Century 21 Department Stores of New Jersey, L.L.C. (1705), Century 21 Gardens of Jersey, LLC (9882), C21 Sawgrass Blue, LLC (8286), C21 GA Blue LLC (5776), and Century Paramus Realty LLC (5033). The Debtors’ principal place of business is: 22 Cortlandt Street, 5th Floor, New York, NY 10007.

Shelley C. Chapman , United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York (Manhattan Division), One Bowling Green New York, NY 10004-1408. Parties should contact the Clerk of the Court for more information regarding the First Day Hearing.

Any party who wishes to attend is required to make arrangements through Court Solutions at www.court-solutions.com or by telephone: (917) 746-7476.

PLEASE TAKE FURTHER NOTICE that an agenda with respect to the First Day Hearing is set forth below. Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, (ii) contacting the Office of the Clerk of the Court at One Bowling Green New York, NY 10004-1408, or (iii) from the Debtors' proposed notice and claims agent, Stretto ("Stretto"), at <http://https://cases.stretto.com/Century21> or by calling (855)541-2858 (toll free) for U.S.-based parties; or +1 (949)504-4528 for International parties or by e-mail at: Century21Inquiries@stretto.com. Note that a PACER password is needed to access documents on the Court's website.

AGENDA FOR September 10, 2020 AT 5:30 P.M. FIRST DAY HEARING

I. Introduction:

1. Introduction – Jeff J. Marwil (Proskauer Rose LLP)

II. Motions and Applications to Be Heard at the First-Day Hearing:

2. Motion of Debtors for Entry of Order Directing Joint Administration of Related Chapter 11 Cases **Case No. 20-12097 (SCC), ECF No. 2**
3. Motion Of Debtors For Entry Of Order Extending Time To File Schedules Of Assets and Liabilities, Schedules Of Executory Contracts And Unexpired Leases, And Statements Of Financial Affairs **Case No. 20-12097(SCC), ECF No. 6**
4. Motion of Debtors for Entry of an Order (I) Authorizing Debtors to (A) File a Consolidated List of Creditors and (B) File a Consolidated List of Debtors' 30 Largest Unsecured Claims, (II) Authorizing Debtors to Redact Certain Personal Identification Information for Individual Creditors and Interest Holders, and (III) Approving Form and Manner of Notifying Creditors of Commencement of these Chapter 11 Cases **Case No. 20-12097(SCC), ECF No. 5**
5. Application of Debtors Seeking Entry of an Order (I) Authorizing and Approving the Appointment of Stretto as Claims and Noticing Agent and (II) Granting Related Relief **Case No. 20-12097(SCC), ECF No. 11**
6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay,

(IV) Scheduling a Final Hearing, and (V) Granting Related Relief **Case No. 20-12097(SCC), ECF No. 12**

7. Motion of Debtors Requesting Authority to (I) Continue Using Existing Cash Management System, Bank Accounts, and Business Forms, (II) Implement Changes to the Cash Management System in the Ordinary Course of Business, (III) Continue Intercompany Transactions, and (IV) Provide Administrative Expense Priority for Postpetition Intercompany Claims, and (V) for Related Relief **Case No. 20-12097(SCC), ECF No. 10**
8. Motion of Debtors for Authorization to Pay Certain Prepetition Taxes and Fees **20-12097(SCC), ECF No. 7**
9. Motion of Debtors for Interim and Final Orders Authorizing, but not Directing, Debtors to (A) Pay Certain Prepetition Wages, Reimbursable Expenses, and Supplemental Workforce Obligations, (B) Pay and Honor Employee Medical and Other Benefits, and (C) Continue Employee Benefits Programs, and for Related Relief **20-12097(SCC), ECF No. 3**
10. Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Maintain their Insurance Policies and Programs and Surety Bond Program and (B) Honor All Obligations with Respect Thereto and (II) Modification of the Automatic Stay with Respect to The Workers' Compensation Program **20-12097(SCC), ECF No. 9**
11. Motion of Debtors for Interim and Final Orders (A)(1) Confirming, on an Interim Basis, that the Store Closing Agreement is Operative and Effective and (2) Authorizing, on a Final Basis, the Debtors to Assume the Store Closing Agreement, (B) Authorizing and Approving Store Closing Sales Free and Clear of all Liens, Claims, and Encumbrances, (C) Approving Dispute Resolution Procedures, (D) Authorizing Customary Bonuses to Employees of Closing Stores, and (E) Approving the Debtors' Store Closing Plan **20-12097(SCC), ECF No. 4**

III. Related Pleadings:

12. Declaration of Norman R. Veit Jr. in Support of Debtors' Chapter 11 Petitions and First Day Motions **20-12097(SCC), ECF No. 13**
13. Memorandum In Support Of Debtors' Chapter 11 Petition **0-12097(SCC), ECF No. 15**

IV. Motions to be Heard at Later Hearing

14. Motion of Debtors Requesting Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (II) Establishing Procedures for Determining Adequate Assurance of Payment for

Future Utility Services, and (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service **20-12097(SCC), ECF No. 8**

Dated: September 10, 2020
New York, New York

Respectfully submitted,

/s/ Lucy F. Kweskin

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